

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION

UNITED STATES OF AMERICA)	DOCKET NO. 5:19-cr-73-KDB
)	
v.)	
)	<u>UNITED STATES OF AMERICA'S</u>
RIANE LEIGH BROWNLEE)	<u>RESPONSE IN OPPOSITION TO</u>
<hr/>)	<u>DEFENDANT'S MOTION FOR RELEASE</u>

NOW COMES the United States of America, by and through R. Andrew Murray, United States Attorney for the Western District of North Carolina, and submits this Response in Opposition to Defendant Brownlee's motion for release (Document 37).

As background, Defendant Brownlee was arrested on June 6, 2019. Her pretrial services report (Document 6) recommended she be detained and the Court ordered that she be detained (Document 10). On October 1, 2019, Defendant Brownlee entered her guilty plea. Her final pre-sentence report was issued on January 30, 2020 (Document 29), and she is pending sentencing on April 14, 2020, just 19 days from now.

In Defendant Brownlee's instant Motion, she discusses the COVID-19 virus and makes representations about the Mecklenburg County Jail that, based on conversations with officials from jail, are no longer correct. For example, the jail has COVID-19 testing kits, they screen inmates for exposure to and symptoms of COVID-19, they perform a more thorough examination if screening reveals any risk factors, and they do have the ability to quarantine COVID-19 patients in accordance with current CDC guidance.

What we are left with is a defendant who is 38 years old and, other than having asthma, appears to be healthy. Even if the Court were, for argument's sake, to grant temporary release to

any defendants based on COVID-19 – which the United States opposes – Defendant Brownlee does not appear to be among the highest risk of defendants.

For the foregoing reasons, we submit Defendant Brownlee should remain in custody.

RESPECTFULLY SUBMITTED this 26th day of March 2020.

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